

Engineering Analysis
Blakeley Boat Works
Facility Number 503-0143

On January 11, 2016, the Department received a request for a permit determination from Blakeley Boat Works, an existing shipyard in Mobile. The Department requested a permit application from the company on January 15, 2016. The application was received on February 22, 2016.

Emissions

Potential air emissions from painting at this shipyard were estimated to be 14 Tons Per Year of Volatile Organic Compounds, 17 TPY of Hazardous Air Pollutants, and 8.6 TPY of xylene, the greatest individual HAP. The application requested permit limits of 95 tons of VOC, 24 tons of HAP, and 9 tons of any individual HAP in any twelve month period. Particulate emissions from welding and sandblasting are not expected to be significant.

NSPS / NESHAP / MACT

The application does not include any sources which are currently subject to New Source Performance Standards, National Emissions Standards for Hazardous Air Pollutants, or Maximum Available Control Technology standards.

State Regulations

The surface coating regulations of ADEM Code R. 335-3-6-.11 will not apply to this shipyard because VOC emissions are less than 100 TPY. Sandblasting work will be subject to the opacity standards of ADEM Code R. 335-3-4-.01.

PSD

This facility is a minor source for PSD. Emissions of all pollutants are expected to remain below the major source thresholds.

Air Toxics

Air toxics were not modeled because this is an existing source with no point sources.

Class I Area

The closest class I area is the Breton Wildlife Refuge. Because this is a minor source, and the class I area is approximately 100 kilometers away, this facility should not significantly affect the air quality in this class I area.

112(g) Case-by-Case Review

Section 112(g) does not apply to this facility because this shipyard will take synthetic minor HAP limits.

Recommendations

Since it appears that this facility would be capable of meeting all applicable state and federal regulations, I recommend approving the attached draft permit. Xylene emissions

are close to the 10 TPY major source threshold, and painting emissions from shipyards can vary greatly. The proposed permit will allow the Department to monitor these air emissions.

Hal Brock
Chemical Branch
Air Division

March 9, 2016

HHB:hbb